



MICHAEL C. DELL'ANGELO / MANAGING SHAREHOLDER
d 215.875.3080 m 610.608.8766 | mdellangelo@bm.net

March 6, 2020

VIA ECF

Honorable Lorna G. Schofield
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

RE: *Contant, et al. v. Bank of America Corp., et al.*, No. 17-cv-3139

Dear Judge Schofield:

Plaintiffs respectfully submit this letter pursuant to Rule I.B.2 of the Court's Individual Rules and Procedures requesting an extension of the fact discovery and pre-motion letter deadlines set forth in the Third Amended Civil Case Management Plan and Scheduling Order (ECF No. 362) (the "CMO"). If granted, this would be the third fact discovery extension in this Action. The parties previously requested discovery extensions on May 1, 2019 (ECF No. 257) and December 9, 2019 (ECF No. 356), both of which were granted by the Court. *See* ECF Nos. 259, 361.

The CMO provides that fact discovery shall be completed by April 13, 2020, sets a case management conference for March 26, 2020, and requires that any party wishing to file any dispositive or class certification motion file a pre-motion letter at least two weeks before the conference (by March 12, 2020). *See* ECF No. 362.

Plaintiffs respectfully submit that a stay *sine die* of the discovery and pre-motion letter deadlines is reasonable and appropriate for the reasons set forth in the February 25, 2020, confidential letter that Plaintiffs submitted to the Court via email pursuant to the Court's Individual Rule I.B.1. If the Court grants this request, the March 26, 2020, conference would also be unnecessary, as the conference was designed to follow the pre-motion letter deadline.

Defendants consent to Plaintiffs' request.

Respectfully submitted,

/s/ Michael Dell'Angelo
Michael Dell'Angelo
BERGER MONTAGUE PC
1818 Market St, Suite 3600
Philadelphia, PA 19103

Tel: (215) 875-3000
Fax: (215) 875-4604
mdellangelo@bm.net